

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Inwinderjit Singh GILL

Case No. 25-mj-30238

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 15, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)	Possession with Intent to Distribute a Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 16, 2025

City and state: Detroit, MI



Complainant's signature

Erald Azizaj, Special Agent
Printed name and title



Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Erald Azizaj, being duly sworn, hereby state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is based on my own personal observations and knowledge as well as my review and analysis of oral and written reports, my discussions with other law enforcement officers, and my training and experience. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

2. I am a Special Agent and currently employed by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) since May of 2023. My formal education includes a Bachelor of Arts Degree in Criminal Justice and Political Science from Wayne State University. From June 2023 through January 2024, I attended the Federal Law Enforcement Training Center (FLETC) at Glynco, Georgia. During this time, I received formalized training in various investigative techniques required of every Special Agent trainee. Following my successful completion of the FLETC training program, I was assigned to HSI's Detroit Field Office.

3. In January 2024 I was assigned to the Detroit's BEST Narcotics Group. The Narcotics Group primarily investigates drug smuggling and drug trafficking cases which have originated across the U.S. borders. As a Special Agent, I have led and participated in investigations related to illegal drug trafficking. Additionally, I have conferred with more senior narcotics investigators regarding better methods of discovering and documenting evidence.

4. Prior to my tenure as a Special Agent with HSI, I served as a Military Intelligence Officer in the United States Army for approximately seven years.

5. Based on this investigation, there is probable cause to believe that Inwinderjit Singh GILL possessed with intent to distribute approximately 154.05 kilograms of cocaine in violation of Title 21 U.S.C. §§ 841(a) (Possession with Intent to Distribute a Controlled Substance).

II. PROBABLE CAUSE

6. On April 15, 2025, at approximately 1730 hours, Customs and Border Protection (CBP) Officers were conducting outbound commercial truck enforcement inspections at the Ambassador Bridge in Detroit, Michigan. Members of the Detroit Contraband Enforcement Team

(DCET) randomly selected Inwinderjit Singh GILL, Indian citizen and permanent resident of Canada, for an inspection.

7. CBP Officer Luke Dockweiler made initial contact and stopped Gill's Haulage LTD truck (ON PA35814) hauling a black soft side trailer (ON W3674N) and requested documentation pertaining to the cargo he was hauling, in which GILL provided.

8. During the inspection, CBP Officer Dockweiler asked GILL if they had any guns, drugs, or cash over \$10,000 in the truck and/or trailer to which GILL replied "no". When asked who owned the truck, GILL stated that he owned the truck, and he was employed by his cousin's company "GILLS HAULAGE LIMITED". CBP Officer Dockweiler asked if he had secured the load to the trailer himself, and he answered "yes".

9. On April 14, 2025, GILL entered the US from Port Huron's Blue Water Bridge Port of Entry (POE) hauling shingles picked up from Building Projects "9510 Saint Patrick, Laselle, Quebec, Canada" destined for CertainTeed Central Shelby "18 Alison Dr. Shelby, OH 44875.

10. On April 15, 2025, during the outbound inspection, GILL stated to CBP Officers that he picked up shingles in Ohio at CertainTeed Roofing "11519 US Route 250 North, Milan, OH 44846, destined for CertainTeed Canada "1080 Squire Beach Rd, Pickering, Ontario Canada.

11. CBP Officer Dockweiler instructed the driver to exit the truck while they conducted a more extensive search. CBP Officer Loehrke began her inspection by entering through the door between the truck and trailer in which she observed pallets extending wall to wall.

12. CBP Officer Loehrke climbed on top and discovered the (2) two large black duffle bags, mentioned above, in the middle of the trailer, along (2) two tan boxes on the right side of the trailer. CBP Officer Loehrke discovered (2) two additional tan boxes on the left side of the trailer.

13. CBP Officer Loehrke opened one of the black duffel bags and noticed black duct taped bricks similarly wrapped to those of narcotics.





Image 1, 2 & 3 – Location of the narcotics

14. CBP Officer Loehrke alerted DCET CBP Officers of her findings which prompted the immediate detention of GILL. When CBP Officers approached GILL to place cuffs on him he began to back away showing signs of deception and nervousness.

15. CBP Officers then secured GILL's phones, one of which was in his right jacket pocket, and the other was next to his driver seat.

16. Large scale NII (X-Ray Examination) of the truck was negative for an anomaly where the duffel bags and boxes were placed due to the cargo being such high density.

17. One of the black duffel bags contained thirteen bricks while the second duffel bag contained sixteen bricks.

18. The first box contained sixteen bricks, the second box contained twelve bricks, the third box contained fifteen bricks, and the fourth box contained thirteen bricks. A brick from each duffel bag and each box were field tested with the Gemini with positive results for cocaine hydrochloride by CBP Officer Haro and witnessed by CBP Officer Omayan.

19. The bricks were all labeled with different types of imprints including a Mitsubishi emblem, a sun emblem, and a BOSE emblem, along with three having a sticker “5 ULTIMOS.”

20. At approximately 2111 hours, CEO Schnell utilized his K9 partner HNDD Evita (220042) who alerted to the trained odor of narcotics.

21. The contraband which totaled 85 bricks with a net weight of 154.05 kg was transported to the seizure processing area by DCET CBP Officers.

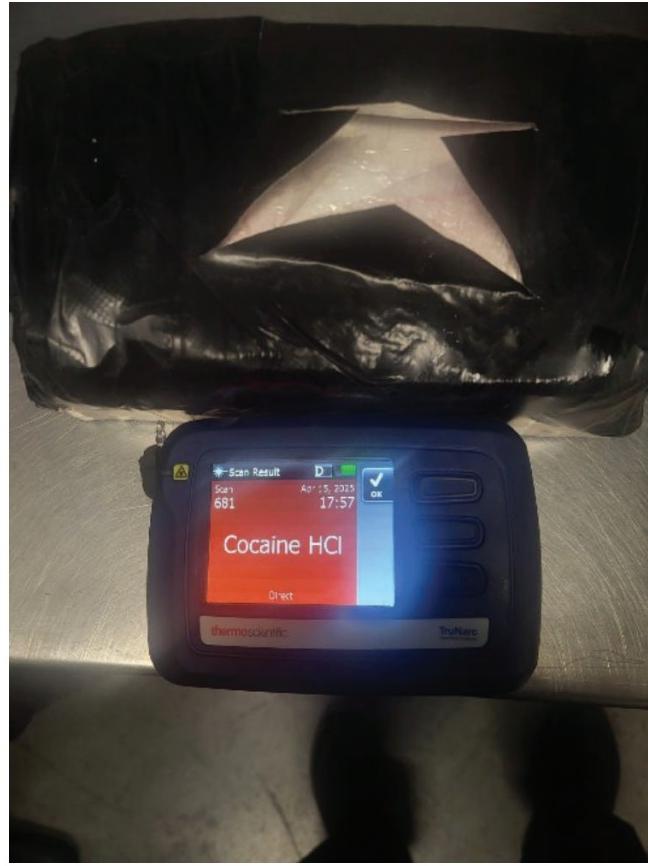


Image 4 – TruNarc Positive Alert (Cocaine)

22. At approximately 2010 hours, SA Erald Azizaj, SA Lonnie Reynolds, SA Brian Manns, and TFO Stacey Logan arrived at the port of entry (POE) and assisted DCET Officers (Dockweiler and Loehrke) with the physical examination of both the truck and trailer



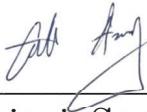
Images 3 – Bulk Seizure (154.05 Kg of Cocaine)

23. When interviewed, GILL indicated to investigators that he had been a truck driver for approximately 10 years making routine international crossings during his tenure. A search of a law enforcement databases revealed that the truck is registered to GILL and trailer's registration plate was registered to the same address as GILL's home address.

24. Due to my training and experience, I estimate the value of the seized suspected cocaine to be approximately \$4,650,000. Your affiant is

aware through his training and experience that this amount of cocaine is consistent with large scale drug distribution activities.

25. Based on the foregoing, there is probable cause to believe that Inwinderjit Singh GILL violated Title 21 U.S.C. §§ 841(a) (Possession with Intent to Distribute a Controlled Substance).



Erald Azizaj, Special Agent
Homeland Security Investigations

Sworn and subscribed before me on this the 16th day of April, 2025.



Hon. Anthony P. Patti
United States Magistrate Judge

DATE: April 16, 2025